

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I, Special Agent Christopher Blair, undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief.

1. I am a Special Agent (SA) of the Federal Bureau of Investigation (FBI), and have been so employed for approximately twelve (12) years. I am currently assigned to the FBI Omaha Division, Violent Crimes Squad, Greater Plains Violent Crimes Task Force (GPVCTF), where I am responsible for investigating violations of various criminal statutes, including those pertaining to the crime of Cyberstalking in violation of 18 U.S.C. § 2261A(2) using an electronic communication service, or an electronic communication system of interstate commerce against individuals. I have been the Case Agent and have assisted in violent crimes, which have resulted in search warrants, arrests, and the seizure of forfeiture and assets. Prior to joining the FBI, I served as a Police Officer with the Omaha Police Department. I have received relevant training in violent crime to include Cyberstalking investigations from the FBI Academy in Quantico, Virginia. I have also acquired knowledge and information about the means and methods of violent crimes from informal training, other law enforcement officers and investigators, informants, persons whom I have arrested and/or interviewed, and my participation in multiple investigations related to violent crime investigations. The aforementioned investigations ultimately led to the arrests and convictions of those persons who violated those federal crimes.

2. This affidavit is based on the following facts, which are known to me as a result of my conversations with law enforcement officers in this case, as well as my personal review of the reports prepared by law enforcement officers and witness statements detailing the events described below. Based on the information gathered, Affiant submits the defendant Gregory Roman

(hereinafter Roman) committed the crime of Cyberstalking in violation of 18 U.S.C. § 2261A(2) using an electronic communication service, or an electronic communication system of interstate commerce against individuals whose identifies are known to Affiant but are referred to in this affidavit as Victim 1 and Victim 2.

3. Victims 1 and Victim 2 herein allege receiving texts and emails from an individual purporting to be the defendant Gregory Roman that are the subject of this investigation. The text messages from Roman to Victim 1 and Victim 2 originated from phone number 816-255-8168 (hereinafter Subject Phone Number). The emails from Roman to Victim 1 and Victim 2 originated from email address gregroman@icloud.com (hereinafter Subject Email Address). Based on my training and experience, I am aware that the Subject Phone Number, the Subject Email Address, and the facilities and systems that provide those means of communication are electronic communication services and/or electronic communication systems engaging in interstate or foreign commerce.

4. Gregory Roman was previously employed by the Federal Bureau of Investigation, Kansas City Division, as an intelligence analyst from February 2011 through August 2017.

5. Victim 1 (an adult male) is an investigator employed by a private investigations firm located in Kansas City in the Western District of Missouri. On October 18, 2021, Victim 1 contacted the Kansas City Missouri Police Department (KCPD) regarding threatening emails he received from an individual who identified himself as Gregory Roman.

6. Victim 1 has reported that his investigative firm had received communications, via email and phone calls, during the months of September and October 2021, from Roman who had requested the firm investigate a decade's old matter and a former FBI official's involvement in

that matter. Victim 1 stated he was not able to help Roman, as the subject of investigation was not within their area of expertise. Roman was not satisfied with this answer and kept calling. Ultimately, when Victim 1 responded to Roman's request for assistance via email by informing Roman about the firm's fees, Roman responded via email with multiple threats in which Roman threatened to kill and seriously injure Victim 1. Investigation determined that Victim 1 was in the Western District of Missouri at the time he received the threatening communications from the Subject Email Address.

7. Affiant has viewed copies of emails provided by Victim 1 from Roman's email address, the Subject Email Address, to Victim 1 which state the following (note: italics hereinafter are added for emphasis only in this affidavit):

On October 18, 2021

Gregory Roman: Evidently neither one of you returns emails or phone calls. [John Doe<sup>1</sup>] did.

Gregory Roman (816) 255-8168.<sup>2</sup>

Victim 1: Greg, I called and left you a message this morning, at 10:34am, and let you know I would not be available until after 1:30pm, I had a doctors appointment. If you would like our assistance please place an order on our website, we are happy to use the hours doing research, we charge \$89 per hour, minimum case is 3 hours, \$267, but we are unable to guarantee any sort of success, and 3 hours for any case is not much time. If [Jane Doe]<sup>3</sup> would like to assist, you will have to call her directly.

Gregory Roman: You know what [Victim 1]??? Go fuck yourself you chicken shit cock sucker.

***I will find you and I will fucking kill you.***

Victim 1: Greg, you send one more email I will contact the police, and place a no

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<sup>1</sup> The name John Doe is used herein to protect the identity of the named individual.

<sup>2</sup> Also referred to herein as the Subject Phone Number.

<sup>3</sup> Jane Doe is an employee of Victim 1's investigative firm. Affiant is aware of the true name and identity of Jane Doe.

contact order on you for harassment.

On October 19, 2021

Gregory Roman: go ahead you sick mother fucker.

On October 22, 2021

Gregory Roman: Call me. 816-255-8168.

But you won't because it was a fucking set up.

Do me a favor [Victim 1]. Tickle the balls of your FBI handler right before he shoots his jizz down your throat.

Pussy.

On October 25, 2021

Gregory Roman: ***I'm going to rip your balls off and shove them straight up your ass.***

Don't believe me? Call 816-512-8200 and ask for Jane Doe 2<sup>4</sup>.

She knows me.

In the meantime...go fuck yourselves.

8. On October 28, 2021 Roman sent another unsolicited email from the Subject Email Address to Victim 1 and Jane Doe (with the subject line "Ass Wipes for Hire") which stated, ***"Seriously. I'm going to skull fuck both of you. Twice."*** Victim 1 advised investigators that he has never met Roman in person. However, Victim 1 believed Roman to have previously served in the armed services and that Roman intended to follow through with his threats, including Roman's threat to kill Victim 1, at the time they were made.

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<sup>4</sup> Phone number 816-512-8200 is the phone number for the office of the FBI Kansas City Division. Jane Doe 2 is an intelligence analyst currently employed by the FBI Kansas City Division. Affiant is aware of the true name of Jane Doe 2.

9. On October 23, 2021, Victim 2 (an adult male) called the FBI National Threat Operations Center (NTOC) to report concerning text messages and threats sent to him by Gregory Roman, from the Subject Phone Number.

10. Victim 2 reports that he and Gregory Roman have been friends for approximately 17 years and were acquainted with each other through the Missouri Army National Guard. Victim 2 states that from previous experience communicating with Roman, he knows Roman's email address to be the Subject Email Address and his phone number to be the Subject Phone Number.

11. According to Victim 2, Roman has displayed a concerning obsession with the FBI, and specifically with a former FBI director, and believes the FBI is an evil organization. Victim 2 reports that he noticed a change in Roman in November 2020 when Roman began having outbursts and exhibited paranoid behavior. Victim 2 stated that he spoke with Roman on October 18, 2021. Roman later expressed his belief to Victim 2 via text that Victim 2 was working for the FBI and was spying on Roman for the FBI. Victim 2 reports he does not have a connection to the FBI. Victim 2 states that Roman has firearms in his residence and is infantry trained, and that he feels threatened by Roman because of the threats he received from Roman and Roman's belief that Victim 2 works for the FBI. Victim 2 stated he contacted law enforcement because the threatening text messages from Roman made him feel nervous and unsettled for his safety. Investigation determined that Victim 2 was in the Western District of Missouri at the time he received the threatening communications from Roman.

12. Specifically, Victim 2 reports that on October 18, 2021, he spoke with Gregory Roman on the phone. Roman made some comments such as "the FBI might rub me out" and "the FBI is investigating me." Later that day, Roman's messages became accusatory, and he alleged

that Victim 2 was working with the FBI and was an FBI informant against Roman. Eventually, Roman threatened to physically harm Victim 2.

13. Affiant has viewed text messages on Victim 2's cell phone sent to Victim 2 that are from a contact identified as "Roman" which state the following:

October 18, 2021 beginning at 5:57 p.m.

Gregory Roman: They were undercover Feds.

Those Pls I told you about...

[Victim 2]!!! It was the goddam Feds!!! Are you napping again???

WTF!!!

Victim 2: What is going on?

Gregory Roman: Can you come over? Now?

Victim 2: No, I can talk in a bit...But my garage door openers are not working...Fixing that problem...

Gregory Roman: Okay. Don't bother.

Ever again.

You fucking piece of shit!!! How fucking long have you been working for them???

Victim 2: DoD? 23 years...

Gregory Roman: I will put flowers on your porch for your wife!!!

Go Fuck Yourself.

Victim 2: Why are you so upset?

Gregory Roman: You lying cocksucker.

Victim 2: What is going on with you?

Gregory Roman: Because you're fucking lying to me.

And you know it.

Victim 2: No, the only person who was FBI in this conversation was you.

Gregory Roman: Okay...tell yourself that asshole. I haven't been FBI since August 8, 2017.

You miserable piece of fucking shit.

Tell your handlers they can go fuck themselves too.

Victim 2: Look man, I am not spying on...I don't know what is going...This seems really unlike you.

Gregory Roman: How long have you been reporting on me?

Victim 2: You said you wanted to talk...

Gregory Roman: HOW LONG!!!

Victim 2: There is no reporting...

Gregory Roman: BULLSHIT!!!

HOW LONG!!!

Victim 2: You didn't tell me anything until today...I was the one that said PI was most likely an agent...

Gregory Roman: HOW LONG!!!

You fucking asshole!!!

Victim 2: Think about the conversation today...I did not ask you shit...

Gregory Roman: I'm asking you now!!! HOW LONG!!!

Victim 2: Look man. I am sorry you feel this way... I am not spying on you. If I was I would have answered yesterday and showed up to your house with a bunch of questions...Think about it...I might be a shitty friend but I am not collecting or spying on you...

Gregory Roman: Yes you are... you lying fucking asshole.

Victim 2: Nope...

Gregory Roman: Then call me right fucking now.

You fuck!!!

October 22, 2021 beginning at 9:11 p.m.

Gregory Roman: You mother fucking cock sucking son of a bitch. How long have you been ratting on me? The fact you weren't on my front porch jumping up and down screaming at me you weren't an FBI snitch tells me everything I need to know. ***It might take me a week or two, but I will make you pay. Your fucking ass is mine. I promise.***

***I'm going to rip your balls off thru your fucking nose. You pathetic piece of shit.***

Question: If [Roman's wife's birthday] or your anniversary falls when you are gone... We would like to return the favor and get her flowers or take her out... Thoughts. That meant a lot to [Victim 2's wife]<sup>5</sup>... Let us know...

You Fuck!!!

How long did it take you to turn on me?

***If it takes me the rest of my life I will fucking burn you down. You fucking cocksucker.***

October 22, 2021 at 10:37 p.m.

Gregory Roman: ***I'm going to rip your balls off and shove them straight up your ass.***

14. On November 3, 2021, Victim 2 called a Kansas City Division FBI Special Agent and reported that Roman had emailed him on October 18, 2021 and stated, ***"You will burn in Hell. I will make sure of it. I know where you live."*** The email was sent from the Subject Email Address and contained the subject line: "You Sorry Assed Motherfucker."

15. On November 8, 2021, a Kansas City Division FBI Special Agent contacted Victim 2 who advised that he knew Roman's email address to be the Subject Email Address. Victim 2 further advised that on an occasion prior to receiving the threatening text messages, Roman had emailed Victim 2 his resume for review. Victim 2 forwarded the Special Agent an email from

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<sup>5</sup> The names of the defendant's and Victim 2's spouses are omitted herein to protect their identities.



Roman dated September 29, 2021 with a PDF file titled “Roman Federal Resume AUG 21.” The Special Agent viewed the attached resume which listed Roman’s telephone number as the Subject Phone Number and his email address as the Subject Email Address. The resume also documented Roman’s employment with the Federal Bureau of Investigation as an intelligence analyst from February 2011 through August 2017.

16. The Kansas City Division FBI Special Agent interviewed Roman’s wife (hereinafter Mrs. Roman) on October 28, 2021 who stated Roman had recently started divorce proceedings and has been living with a family member. Mrs. Roman stated that Roman was currently in Florida visiting a friend and that he plans to move there. Mrs. Roman believed Roman was in Colorado from October 15 through 17, 2021. Mrs. Roman stated that Roman felt betrayed by the FBI because of the way they handled his employment situation prior to Roman leaving the FBI. Mrs. Roman reported that Roman is under huge amounts of stress and has been on “retirement disability” since March 2021. Mrs. Roman stated Roman began seeing psychiatrists in late 2020 and recalls Roman discussing “dissociative disorder.” Mrs. Roman confirmed that Roman owns an assortment of firearms. The Kansas City Division FBI Special Agent interviewed Mrs. Roman again on November 15, 2021. Mrs. Roman confirmed that the Subject Phone Number belongs to her husband (Roman). Mrs. Roman stated she has her own cell phone with her own number and that she does not use Roman’s phone and has not texted anyone from his phone. Further, Mrs. Roman stated Roman has an iCloud email account. She could not recall the email address but stated she does not use any personal accounts belonging to Roman. Mrs. Roman stated the last time she saw Roman in person was on October 13, 2021. On December 14, 2021, Affiant spoke with Mrs. Roman who stated she believes that her husband has been living in Vero Beach,

Florida in rental property and has communicated with him primarily through their divorce attorneys. Mrs. Roman could not provide an address for Roman and his current residence and whereabouts are unknown to Affiant at this time.

17. On November 2, 2021, a Grand Jury Subpoena, issued in the Western District of Missouri, was served to Apple Inc., requesting subscriber and account information for the Subject Email Address. Apple Inc. responded to the subpoena with the following information:

Account Holder: Roman Gregory at 5133 NW Belton Court, Riverside, MO<sup>6</sup>  
Associated Phone Number: 816-255-8168<sup>7</sup>  
Alternate Email Address: Gregory.t.roman@us.army.mil  
Activation Date: May 11, 2010

18. Affiant is aware that in September and October 2021 two reports were made by separate individuals to the FBI tip line regarding concerning conduct by Gregory Roman unrelated to the allegations made by Victim 1 and Victim 2. In the first report, the reporting party stated that she recently spoke with Gregory Roman by phone and text on multiple occasions and that Roman seemed fixated by the “Ruby Ridge” incident and a former FBI deputy director’s connection to “Ruby Ridge.” She stated that Roman believed that the Department of Justice and the Kansas City FBI were responsible for his continued unemployment since leaving the FBI and that his demeanor seemed “aggressive and scary.” In the second report, the reporting party, who was acquainted with Roman through the Missouri Army National Guard, reported that he received an email from Roman who believes the reporting party was responsible for the manner in which Roman’s employment with the FBI concluded and negative career opportunities with the National Guard. In the email, Roman stated to the second reporting party *“If it takes me the rest of my life, I will*

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<sup>6</sup> Affiant has confirmed this address is Roman’s last known address.

<sup>7</sup> Also referred to herein as the Subject Phone Number

*figure out a way to fuck the both of you. I goddam guarantee it. You're officially on notice. I'm going to ruin you."* Additionally, a current FBI employee reported that in July 2021 Roman messaged him on multiple occasions via the LinkedIn private messaging system reference the discontinuation of Roman's employment with the FBI. In one message, Roman wrote *"...I will spend the rest of my life dedicated to one thing and one thing only: ruining you and all the assholes in the FBI I once thought were good people..."* In a related public LinkedIn posting, which mentioned the FBI employee, the defendant commented that *"Revenge is a dish best served cold."*

Based upon the forgoing, the undersigned respectfully submits that there is probable cause to charge the defendant Gregory Roman with Cyberstalking in violation of 18 U.S.C. § 2261A(2) in the Western District of Missouri and elsewhere.

FURTHER AFFIANT SAYETH NAUGHT.



Christopher Blair  
Special Agent  
Federal Bureau of Investigation

Subscribed to and sworn to me by telephone this 20<sup>th</sup> day of December, 2021.

By telephone at 2:04 pm



HONORABLE W. BRIAN GADDY  
United States Magistrate Judge  
Western District of Missouri

